

# EXHIBIT B

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

ZOHO CORPORATION,

Plaintiff,

v.

LIBERTY PEAK VENTURES, LLC,

Defendant.

Civil Action No. 1:22-cv-37-LY

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LIBERTY PEAK VENTURES, LLC,

Counterclaimant,

v.

ZOHO CORPORATION,

Counter-Defendant,

and

ZOHO CORPORATION PVT. LTD.

Third-Party Defendant.

**ZOHO’S DISCLOSURE OF CLAIM TERMS FOR CONSTRUCTION**

Pursuant to the Pre-*Markman* Scheduling Order (Dkt. No. 19), Zoho Corporation and Zoho Corporation Pvt. Ltd. (collectively “Zoho”) hereby identify the following claim terms which Zoho currently contends should be construed by the Court and/or any claim terms which should be governed by 35 U.S.C. § 112(6). Zoho reserves all rights to amend or supplement in accordance with the applicable rules and orders.

**U.S Patent No. 9,373,122:**

- 1) “browser toolbar”
- 2) “account information”
- 3) “encryption key”
- 4) “maintained by the browser toolbar”
- 5) “inaccessible outside of the browser toolbar”
- 6) “securely storing account information at the browser toolbar”
- 7) “web service”
- 8) “generating, via the browser toolbar”
- 9) “determining, at a browser toolbar”
- 10) “decrypting, at the browser toolbar”
- 11) “providing, via the browser toolbar, the stored account information to the web service”
- 12) “providing the account information to the web service to initiate the transaction”

**U.S Patent No. 10,956,901:**

- 1) “cryptographic key”
- 2) “account information”
- 3) “browser toolbar”
- 4) “securely storing, by the browser toolbar, the account information at the browser toolbar”
- 5) “web service”
- 6) “generating, at a browser toolbar”
- 7) “providing, by the browser toolbar, the account information to a web service”

**U.S Patent No. 10,074,088:**

- 1) “cryptographic key”
- 2) “account information”
- 3) “browser toolbar”

- 4) “securely storing, by the browser toolbar, the account information at the browser toolbar”
- 5) “web service”
- 6) “generating at a browser toolbar”
- 7) “determining, at a browser toolbar”
- 8) “providing, by the browser toolbar, the account information to [a/the] web service”

Dated: October 5, 2022

Respectfully submitted,

By: /s/ Phillip J. Haack

Phillip J. Haack

Darryl Adams  
Texas State Bar No. 00796101  
dadams@sgbfirm.com  
SLAYDEN GRUBERT BEARD PLLC  
401 Congress Ave., Ste. 1650  
Austin, Texas 78701  
Telephone: (512) 402-3550  
Facsimile: (512) 402-6865

Ryan Marton (admitted *pro hac vice*)  
Phillip Haack (admitted *pro hac vice*)  
MARTON RIBERA SCHUMANN & CHANG LLP  
548 Market Street, Suite 36117  
San Francisco, CA 94104  
Telephone: (415) 360-2515  
Email: ryan@martonribera.com  
phil@martonribera.com

*Attorneys for Zoho Corporation and  
Zoho Corporation Pvt. Ltd.*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on March 22, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via email.

Dated: March 22, 2022

/s/ Phillip J. Haack  
Phillip J. Haack